

REMARKS

Claims 1-13 are all the claims pending in the application. By this Amendment, claims 1-3, 7, and 8. Claims 2, 7, and 8 are editorially amended for reasons of precision of language and consistency. The amendments to claims 2, 7, and 8 do not narrow the literal scope of the claims and thus do not implicate an estoppel in the application of the doctrine of equivalents. The amendments to claims 2, 7, and 8 were not made for reasons of patentability. Claims 1 and 3 are amended to further clarify the invention.

In addition, Applicant adds claims 9-13. Claims 9-13 are clearly supported throughout the specification, *e.g.*, page 3, and pages 6-7 of the specification.

Claims 1-8 were rejected in the Final Office Action (Paper No. 14) under 35 U.S.C. § 103(a) as being obvious over Kabay in view of Poon. The Examiner maintains that the dialed number, DN as taught by Kabay is equivalent to a predetermined character string corresponding to an order to send a signaling message. Moreover, with respect to the dependent claim 2, the Examiner alleges that Kabay's interceptor is capable of detecting where the receiver signaling message is addressed to. Therefore, Kaybay's detector is equivalent to the detector set forth in claim 2. Finally, the Examiner alleges that a number of features argued by the Applicant are not in the recited claims (*see* continuation sheet of the Advisory Action, Paper No. 16).

Claims 1 and 3 are now amended to further clarify the invention. Claims 1 and 3 recite a unique combination of features including "the order to send is a predetermined constant character string." Kabay's dialed numbers, on the other hand, are not a predetermined constant character string but rather an address of the destination party. For example, a phone number A and a phone number B, each comprising of different digits would result in an IAM being sent. In

other words, the IAM will be sent when various dialed numbers are received. In short, Kabay fails to teach or suggest the order being a predetermined constant character string. In Kabay, the IAM message will be sent when various different phone numbers are received. The sending of an IAM message is not triggered with a constant but rather with a number of different dialed numbers. Poon fails to cure the deficient teachings of Kabay. For at least these reasons, Applicant respectfully submits that independent claims 1 and 3 are patentable over the combined teachings of the references. Claims 2 and 4-8 are patentable at least by virtue of their dependency.

In addition, with respect to the dependent claim 2, the Examiner further alleges that the fact that claim 2 recites “a detector recognizing whether the receiver signaling message is addressed to the switch” is an intended use phrase and Kabay is capable of performing the intended use phrase of claim 2 (*see* continuation sheet of the Advisory Action, *Id.*). In Kabay, however, there is no detector designed to determine whether the message is intended for itself or whether it should be forwarded elsewhere. In other words, simply forwarding the message to a designated destination is very different from determining whether the message is addressed to its device and if so processing this message. In Kabay, the interceptor box only intercepts the messages, as such the message will never be intended for the device. As a result, Kabay does not have a detector that would be capable of recognizing that the device is intended for the interceptor box.

Moreover, in order to provide more varied protection, Applicant adds claims 9-13.

In view of the clarified ambiguities, allowance of this application is now believed to be in order. If any points remain in issue which the Examiner feels may be best resolved through a

Amendment under 37 C.F.R. § 1.114
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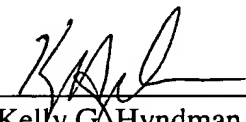
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personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Entry and consideration of this Amendment are respectfully requested.

Respectfully submitted,



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